

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

JAMAR HOLT

*

Case No.: JFM-03-0558

Defendant

*

*

* * * * *

MOTION TO DISCONTINUE HOME DETENTION

The Defendant, Jamar Holt, through his counsel, Kenneth W. Ravenell, and Murphy & Falcon, P.A., hereby moves to discontinue home detention, and in support thereof, states as follows:

1. Mr. Holt is currently on electronic home detention under the supervision of Ms. Kim Smith (hereinafter “Ms. Smith”) at Pre-Trial Services.

2. Mr. Holt seeks to discontinue his home detention status so that he may work longer hours at his two jobs. Mr. Holt recently found employment with the National Center on Institutions & Alternatives (“NCIA”) at 7138 Windsor Blvd., Baltimore, MD 21244 where he works Monday through Friday from 7:30 am to 4:00 pm. NCIA provides individual care and treatment for intellectually and emotionally disabled young and adults and those involved in the criminal justice system. Mr. Holt’s employer’s name is James Hack and can be contacted at 443-780-1379 (office); 443-463-3039 (cell); 410-298-8452 (fax); jhack@ncianet.org (email).

3. Mr. Holt also works at Hollywood Auto, located at 722 Dulaney Valley Road, Towson, MD 21204, where he works as a transporter. As a transporter, Mr. Holt goes to auctions and bids on vehicles on behalf of the dealership. He also transports vehicles to and from the

auctions. Mr. Holt's supervisor is Carletta Floyd, and she can be reached at 443-743-7795.

4. Mr. Holt sought additional employment because he needed the health and dental benefits for his family, and he needed additional income to pay his monthly living expenses. Because of the hourly restrictions, however, Mr. Holt is unable to work at Hollywood Auto after his employment at NCIA.

5. Because he has been fully compliant during his period of home detention, Ms. Kimberly Smith has no specific objections, outside of the pending State case, which is currently on appeal by the State¹, to Mr. Holt's request to discontinue home detention so that he may increase his daily work hours.

WHEREFORE, the Defendant respectfully requests that this Court hold a hearing and/or grant Defendant's Motion to Discontinue Home Detention.

Respectfully submitted,

/S/

Kenneth W. Ravenell
Murphy & Falcon, PA
One South Street, Suite 2300
Baltimore, Maryland 21202
Attorney for Defendant

¹ The Honorable Wanda Keyes Heard of the Circuit Court for Baltimore City granted Defendant's Motion to Suppress finding that the stop made by the police was illegal. The State thereafter filed an appeal pursuant to Md. code Ann., Cts. & Jud. Proc. Art. § 12-302(c).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of July, 2012, a copy of the foregoing Motion to Discontinue Home Detention was served on all parties and their counsel via ECF.

/S/

Kenneth W. Ravenell

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

JAMAR HOLT

*

Case No.: _____

Defendant

*

*

* * * * * * * * * * * *

ORDER

Upon consideration of Defendant's consent Motion to Discontinue Home Detention, it is
this _____ day of _____, 2012, hereby

ORDERED that the Defendant be permitted to discontinue home detention.

JUDGE